

**REMARKS**

Claims 1-27 are pending in this application, with Claims 1 and 25-27 being in independent form. In the Office Action Claims 1, 2, 5-6 and 24-27 were rejected under 35 U.S.C. §103(a) as being unpatentable over “Visualizing Crowds at a Web Site” (Minar) in view of “WebQuery: Searching and Visualizing the Web through Connectivity,” (“Carriere,” which the Examiner interchangeably refers to as Carriere or Nortel). Claims 3 and 4 were rejected under 35 U.S.C §103(a) as being unpatentable over Minar in view of Nortel (Carriere) and further in view of U.S. Patent No. 6,289,353 B1 (Hazelhurst). Claims 7-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Minar in view of Nortel (Carriere).

This Amendment is responsive to the interview conducted between Applicants’ representative, Victor A. Grossman, and the Examiner on December 13, 2005, in which the patentability of independent Claims 1, 25, 26, and 27 was discussed. The courtesy extended by the Examiner in scheduling and conducting the interview is greatly appreciated.

Regarding the Examiner’s rejection of independent Claim 1, the Examiner states that Minar teaches each and every step of Claim 1 except for the step of depicting the two or more categories and the subcategories such that the subcategories are graphically depicted within a corresponding category of the two or more categories by the graphical representation, which the Examiner states is taught by Carriere in FIG. 3. It is respectfully submitted that Carriere does not disclose at least this element.

Minar discloses a visualization of crowds of people visiting a web site wherein the visitors are drawn as icons on a map of the web site. Moreover, Minar discloses each document icon represents a collection of logically related pages and that all of the authors pages can be grouped as /people/nelson and all of the Software Agents group's pages are under /groups/agents and that for the visualization, *a single icon represents all pages in one group* (Crowd Visualization and Site Map). In other words, all pages in a group are represented by *a single icon*. Furthermore, although Minar discloses "an icon's color can represent the kind of group it is, (research group page, personal page, project page, etc.)," the pages within these groups cannot be distinguished from other pages with the same group as the pages are all represented by a single icon. Therefore, a visitor to the site as taught by Minar cannot differentiate pages within the same page group, as all pages in a page group are represented by a single icon. Minar further teaches if a person has been to the site before and is fetching another page in the same page group, then the icon is jittered a bit around the page to convey activity.

Carriere discloses a WebQuery system for searching the Web based on connectivity and content. Carriere further teaches the WebQuery system hones searches and alleviates the effects of vocabulary problems. In other words, Carriere teaches performing a query (i.e., a Web query) and thereafter visually depicting the results of the searched query. In Example 1 of Carriere, a search query is conducted containing the search term "Rick Kazman" and the results of the searched query, which contains (e.g., see the "hit set", which includes a number of URLs which could not be identified) are depicted in FIG. 3 using a "bullseye" technique. In other words FIG. 3 depicts the result of a search query. These results, cannot be equated with the mapping data

structure as recited in the claims of the present invention. Moreover, although Carriere teaches a “bull’s eye” graph showing the results of a user’s query, this graph does not teach or suggest mapping users’ interaction with a Website as recited by the claims of the present invention.

With reference to FIG. 3, which shows the results of a user’s search query (i.e., “Rick Kazman”), Carriere teaches the concentric circles contain nodes of equal connectivity. During the interview, the Examiner stated that he equated the area within the innermost concentric ring (e.g., see reference numeral “1”) with the categories as recited by the claims of the present application and that he equated area demarcated by the outer concentric rings (e.g., areas “2” and “3”) with the subcategories. However, Fig. 3 of Carriere actually teaches away from the claims of the present invention which recite depicting the two or more categories and the subcategories such the subcategories are graphically depicted within the corresponding category of the two or more categories by graphical representation. This is more clearly illustrated with reference to FIG. 3A of the present application, where a category is depicted as the area between the lines which extend radially outward from the center of the arc. Accordingly, the subcategories (i.e., a plurality of subcategories) can be graphically depicted within the category, and are each illustrated as areas between the concentric arcs extending between radial lines. This is neither taught nor suggested by Carriere.

Moreover, the Examiner stated, in the alternative, that the URLs shown in FIG. 3 (of Carriere) teach the graphical depiction of the categories with the categories and subcategories as recited in Claim 1. However, Carriere teaches that the URLs are just labels and by default no

URLs (e.g., “http://www.cgl.uwaterloo.ca” and “http://www.cgl.uwaterloo.ca/~rkazman”) are shown in the display. Carrier further teaches that the two nodes in the innermost circle were interactively selected so that the user could determine their identities (apparently by showing the URLs). In other words, the nodes (which depict resultant hits of a user’s query) must be selected by the user before a corresponding label (i.e., URL) is shown. These URL are merely URLs and do not teach or suggest categories or subcategories nor do they teach or suggest depicting the two or more categories and the subcategories such the subcategories are graphically depicted within the corresponding category of the two or more categories by graphical representation, as recited in Claim 1.

In contrast to that which is taught by Carriere, Claim 1 includes the recitation of depicting the two or more categories and the subcategories such that the subcategories are graphically depicted within a corresponding category of the two or more categories, which is neither taught nor suggested by Carriere or Minar or a combination thereof. Accordingly, is respectfully requested that the rejection under 35 U.S.C. §103 of Claim 1 be withdrawn.

Claims 25-27 are patentably distinct for at least the same reasons as stated above with respect to the rejection of Claim 1. Withdrawal of rejection of Claims 25-27 is respectfully urged..

Independent Claims 1 and 25-27 are believed to be in condition for allowance. Without conceding the patentability per se of dependent Claims 2-24, it is submitted that they are

allowable at least by virtue of their dependencies on independent Claim 1. Accordingly, all of the claims pending in the application, namely Claims 1-27, are believed to be in condition for allowance and allowance is respectfully requested.

Should the Examiner have any questions regarding this communication or feels that an interview would be helpful in advancing the prosecution of this application, the Examiner is requested to contact the undersigned attorney.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Musella', written over the printed name.

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